

From: [Hurlin, David](#)
To: [Pugliese, Holly](#)
Subject: FW: EPA Exemption EXT 2020-NOVEMBER-LD-TEST-I-13811
Date: Thursday, May 18, 2023 8:36:43 AM
Attachments: [Testing Exemption Final 3-06.pdf](#)

David C. Hurlin
EPA Imports Line, Exemptions
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From: Hurlin, David
Sent: Friday, October 29, 2021 2:12 PM
To: mirox@aol.com
Subject: RE: EPA Exemption EXT 2020-NOVEMBER-LD-TEST-I-13811

Miro Kefurt,
You should apply for a testing exemption for those vehicle prior to them being shipped.

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From: mirox@aol.com <mirox@aol.com>
Sent: Friday, October 29, 2021 2:06 PM
To: Hurlin, David <hurlin.david@epa.gov>
Subject: Re: EPA Exemption EXT 2020-NOVEMBER-LD-TEST-I-13811

Hello Mr. Hurlin:

Thank you very much for granting the testing exemption extension.

I have a quick question for you.

We have decided to purchase two more vehicles directly from UAZ for testing, for which we already paid (I have invoice) and we have just received the VIN numbers that were assigned to them yesterday.

The vehicles are yet to be shipped from Russia to USA.

Can I submit the exemption request for those two vehicles with just the invoice and VIN, or do I have to wait till they are actually shipped.

Of course I will provide exact details why those vehicles are also needed in the new exemption request,

but briefly these are the reasons:

1.) The two vehicles we already have are quipped with anti rust injection of "paste" that tends to melt at high temperatures (120 to 140 F) and since it is petroleum based, evaporative tests that were conducted in Europe have identified this as reason for "fail" even if no fuel is in the vehicle.

Since it is injected into the body during manufacture it is impossible to remove it once it is assembled.

Thus the two new vehicles have been manufactured without this "filler" so we can conduct accurate evaporative tests in USA.

2.) Both vehicles we already have are Automatic Transmission, and over the last year promoting the vehicles on our website and consulting with potential future dealers we have surprisingly found out that there is very high interest in Manual Transmission 4x4 SUV - originally we had no intention to market any vehicles without Automatic Transmission in USA. However since AT and MT requires separate Certificate of Compliance, we need one of the SUV with MT for initial evaluation to determine if indeed the vehicle performs so it would be suitable for US customers.

Only ONE of the two vehicles will be SUV with MT (and without the "anti-rust")

3.) The UAZ also just started to make PICKUP like MPV with 4 doors and small cargo bed, that is built on identical chassis with the SUV (same engine and AT), so we would like to have both vehicle versions on the same CoC and CARB EO, but need to determine which of the two (SUV or PICKUP) is the "worse case" vehicle. On which the final certification testing will be conducted.

This one is MPV with AT (and also without the "anti-rust")

So can I apply for the exemption for these two new vehicles now, or should I wait until they are ready to be shipped ?

Thanks you for your assistance.

Sincerely

Miro Kefurt
CEO
BREMACH, Inc.

-----Original Message-----

From: Hurlin, David <hurlin.david@epa.gov>

To: mirox@aol.com <mirox@aol.com>

Sent: Fri, Oct 29, 2021 9:31 am

Subject: EPA Exemption EXT 2020-NOVEMBER-LD-TEST-I-13811

Miro Kefurt,

Attached is your EPA Testing exemption letter (extension). You will need to send documentation that the vehicles have been exported or destroyed at the end of the exemption so I can remove it from my list (copy of export paperwork and a copy of this letter).

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